

1 E. MARTIN ESTRADA
2 United States Attorney
3 MACK E. JENKINS
4 Assistant United States Attorney
5 Chief, Criminal Division
6 JENA A. MACCABE (Cal. Bar No. 316637)
7 KEVIN J. BUTLER (Cal. Bar No. 329129)
8 Assistant United States Attorneys
9 Violent and Organized Crime Section
10 1300 United States Courthouse
11 312 North Spring Street
12 Los Angeles, California 90012
13 Telephone: (213) 894-5046/6495
14 Facsimile: (213) 894-0141
15 E-mail: jena.maccabe@usdoj.gov
16 kevin.butler2@usdoj.gov

17 Attorneys for Plaintiff
18 UNITED STATES OF AMERICA

19 UNITED STATES DISTRICT COURT

20 FOR THE CENTRAL DISTRICT OF CALIFORNIA

21 UNITED STATES OF AMERICA,

22 No. CR 23-149 (A)-FLA

23 Plaintiff,

24 GOVERNMENT'S THIRD AMENDED EXHIBIT
25 LIST

26 DAEKUN CHO,
27 aka "DK,"

28 Trial Date: March 19, 2024
29 Trial Time: 8:30 a.m.
30 Location: Courtroom of the Hon.
31 Fernando L. Aenlle-
32 Rocha

33 Defendant.

34 Plaintiff United States of America, by and through its counsel
35 of record, the United States Attorney for the Central District of
36 California and Assistant United States Attorneys Jena A. MacCabe and
37 Kevin J. Butler, hereby submits its third amended exhibit list in the
38 above-captioned case.

39 The government reserves the right to supplement its exhibit
40 list, and to offer unlisted exhibits for purposes of cross-

1 examination, impeachment, or rebuttal, and to refresh witnesses'
2 recollection with documents not on this list.

3 Dated: March 18, 2024

Respectfully submitted,

4 E. MARTIN ESTRADA
United States Attorney

5 MACK E. JENKINS
6 Assistant United States Attorney
Chief, Criminal Division

7 /s/

8 JENA A. MACCABE
9 KEVIN J. BUTLER
10 Assistant United States Attorneys

11 Attorneys for Plaintiff
12 UNITED STATES OF AMERICA

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

UNITED STATES v. DAEKUN CHO**No. CR 23-149 (A) -FLA****THIRD AMENDED EXHIBIT LIST**

Ex. #	Description	Witness Establishing Foundation	Objections and Reasons	Date Identified	Date Admitted
1.	9mm firearm (Physical Exhibit)	HSI SA Karen Gaspar	FRE 403		
2.	Glock 17 firearm (Physical Exhibit)	HSI SA Karen Gaspar	FRE 403		
3.	Partially built ghost gun (Physical Exhibit)	HSI SA Karen Gaspar	FRE 403		
4.	Motorola (Physical Exhibit)	HSI SA Karen Gaspar/HSI SA John Armstrong			
5.	Skeleton masks (Physical Exhibit)	HSI SA Karen Gaspar/HSI SA John Armstrong			
6.	Pink baseball bat (Physical Exhibit)	HSI SA Karen Gaspar/HSI SA John Armstrong			
7.	Black baseball bat (Physical Exhibit)	HSI SA Karen Gaspar			
8.					

Ex. #	Description	Witness Establishing Foundation	Objections and Reasons	Date Identified	Date Admitted
9.					
10.	Carjacking video angle 1	Y.S.			
11.	Carjacking video angle 2	Y.S.			
12.	Dash camera video part 1	Y.S.			
13.	Dash camera video part 2	Y.S.			
14.	Soopsok assault video 1	Y.K.			
15.	Soopsok assault video 2	Y.K.			
16.	Soopsok assault video 3	Y.K.			
17.	Defendant's first phone call with S.S. during attempted extortion	S.S.			
18.	Defendant's second phone call with S.S. during attempted extortion	S.S.			

Ex. #	Description	Witness Establishing Foundation	Objections and Reasons	Date Identified	Date Admitted
19.	On and Off shooting video 1	I.D.K.			
20.	On and Off shooting video 2	I.D.K.			
21.	Body camera of shooting aftermath	LAPD Officer Stephen Cavazos			
22.	Body camera of shooting aftermath	LAPD Officer Stephen Cavazos			
23.	On and Off shooting video 2 annotated	I.D.K.			
24.					
25.					
26.					
27.	Venmo payment chart (Y.S.)	Y.S.			
28.	Venmo payment chart (J.L.)	J.L.			
29.	Venmo payment chart (S.S.)	S.S.			
30.	Venmo payment chart (K.Y.J.)	K.Y.J.			

Ex. #	Description	Witness Establishing Foundation	Objections and Reasons	Date Identified	Date Admitted
31.	Venmo payment chart (Y.K.)	Y.K.			
32.	Venmo screenshots	Y.S.			
33.	Venmo screenshots	J.L.			
34.	Venmo screenshots	S.S.			
35.	Venmo screenshots	K.Y.J.			
36.	Venmo screenshots	Y.K.			
37.	Venmo payment excel sheet 1	902(11) / Frank Cannata			
38.	Venmo payment excel sheet 2	902(11) / Frank Cannata			
39.					
40.					
41.					
42.	CAST expert report	FBI Expert Jeff Bennett			
43.					
44.					

Ex. #	Description	Witness Establishing Foundation	Objections and Reasons	Date Identified	Date Admitted
45.	Defendant's Instagram profile regarding Grape Street Crips	J.L./LAPD Officer Jacob C. Rice	Motion in Limine		
46.	Defendant's Instagram post regarding Grape Street Crips 1	J.L./LAPD Officer Jacob C. Rice	Motion in Limine		
47.	Defendant's Instagram post regarding Grape Street Crips 2	J.L./LAPD Officer Jacob C. Rice	Motion in Limine		
48.	Defendant's Instagram post regarding Grape Street Crips 3	J.L./LAPD Officer Jacob C. Rice	Motion in Limine		
49.	Defendant's Instagram post regarding Grape Street Crips 4	J.L./LAPD Officer Jacob C. Rice	Motion in Limine		
50.	Defendant's Instagram post regarding Grape Street Crips 5	J.L./LAPD Officer Jacob C. Rice	Motion in Limine		

Ex. #	Description	Witness Establishing Foundation	Objections and Reasons	Date Identified	Date Admitted
51.	Defendant's Instagram post regarding Grape Street Crips 6	J.L./LAPD Officer Jacob C. Rice	Motion in Limine		
52.	Photo of Y.S.'s injuries 1	Y.S.	FRE 403: Cumulative as proposed		
53.	Photo of Y.S.'s injuries 2	Y.S.	FRE 403: Cumulative as proposed		
54.	Photo of Y.S.'s injuries 3	Y.S.	FRE 403: Cumulative as proposed		
55.	Photo of Y.S.'s injuries 4	Y.S.	FRE 403: Cumulative as proposed		
56.	Photo of Y.S.'s injuries 5	Y.S.	FRE 403: Cumulative as proposed		
57.	Photo of Y.S.'s injuries 6	Y.S.	FRE 403: Cumulative as proposed		
58.	Photo of Y.S.'s injuries 7	Y.S.	FRE 403: Cumulative as proposed		
59.	Photo of Y.S.'s injuries 8	Y.S.	FRE 403: Cumulative as proposed		

Ex. #	Description	Witness Establishing Foundation	Objections and Reasons	Date Identified	Date Admitted
60.	Defendant's Instagram post wearing the skeleton mask	Y.S./J.L.			
61.					
62.					
63.					
64.					
65.					
66.	Photo of Motorola hidden under sink	HSI SA John Armstrong			
67.	Photo of Motorola	HSI SA John Armstrong			
68.	Photo of firearm and ammunition at defendant's house	HSI SA Karen Gaspar	FRE 403		
69.	Photo of Glock 17	HSI SA John Armstrong/ HSI SA Karen Gaspar	FRE 402, 403 to any photos of IDs, knives, credit cards, drug paraphernalia		

Ex. #	Description	Witness Establishing Foundation	Objections and Reasons	Date Identified	Date Admitted
70.	Photo of pistol with barrel extension and extended magazine	HSI SA Karen Gaspar			
71.	Photo of mask and hat	HSI SA Karen Gaspar/HSI SA John Armstrong			
72.	Photo of ammunition	HSI SA Karen Gaspar			
73.	Photo of baseball bat	HSI SA Karen Gaspar/HSI SA John Armstrong			
74.	Photo of closet	HSI SA John Armstrong			
75.	Photo of AR pistol	HSI SA Karen Gaspar			
76.					
77.					
78.					
79.					
80.					
81.					
82.					

Ex. #	Description	Witness Establishing Foundation	Objections and Reasons	Date Identified	Date Admitted
83.	Defendant's texts to K.Y.J.	K.Y.J.			
84.	Defendant's texts to Y.K. in October 2022	Y.K.			
85.	Defendant's texts to Y.K. in January 2023	Y.K.			
86.	Defendant's texts to J.L.	J.L.			
87.	Defendant's group texts with S.S., Y.K., and others	S.S./Y.K.			
88.	Defendant's texts to S.S. in January 2023	S.S.			
89.	Defendant's texts to S.S. in February 2023	S.S.			
90.					
91.	Defendant's Kakao profile 1	FBI Digital Forensic Examiner Keanu L. Beltran			

Ex. #	Description	Witness Establishing Foundation	Objections and Reasons	Date Identified	Date Admitted
92.	Defendant's Kakao profile 2	FBI Digital Forensic Examiner Keanu L. Beltran			
93.	Defendant's texts (Bates 9185-9189)	FBI Digital Forensic Examiner Keanu L. Beltran			
94.	Defendant's texts (Bates 9192-9193)	FBI Digital Forensic Examiner Keanu L. Beltran			
95.	Defendant's texts (Bates 9220-9222)	FBI Digital Forensic Examiner Keanu L. Beltran			
96.	Defendant's texts (Bates 9256-9262)	FBI Digital Forensic Examiner Keanu L. Beltran			
97.	Defendant's texts (Bates 9268-9281)	FBI Digital Forensic Examiner Keanu L. Beltran			
98.	Defendant's texts (Bates 9282-9283)	FBI Digital Forensic Examiner Keanu L. Beltran			

Ex. #	Description	Witness Establishing Foundation	Objections and Reasons	Date Identified	Date Admitted
99.	Defendant's texts (Bates 9353-9355)	FBI Digital Forensic Examiner Keanu L. Beltran			
100.	Defendant's texts (Bates 9364-9365)	FBI Digital Forensic Examiner Keanu L. Beltran			
101.	Defendant's texts (Bates 9385-9396)	FBI Digital Forensic Examiner Keanu L. Beltran			
102.	Defendant's texts (Bates 9396-9407)	FBI Digital Forensic Examiner Keanu L. Beltran			
103.	Defendant's texts (Bates 9570)	FBI Digital Forensic Examiner Keanu L. Beltran			
104.	Defendant's texts (Bates 9574)	FBI Digital Forensic Examiner Keanu L. Beltran			
105.	Defendant's texts (Bates 9735-9740)	FBI Digital Forensic Examiner Keanu L. Beltran			

Ex. #	Description	Witness Establishing Foundation	Objections and Reasons	Date Identified	Date Admitted
106.	Defendant's texts (Bates 9762)	FBI Digital Forensic Examiner Keanu L. Beltran			
107.	Defendant's texts (Bates 9821)	FBI Digital Forensic Examiner Keanu L. Beltran			
108.	Defendant's texts (Bates 9823)	FBI Digital Forensic Examiner Keanu L. Beltran			
109.	Defendant's texts (Bates 9912-9913)	FBI Digital Forensic Examiner Keanu L. Beltran			
110.	Defendant's texts (Bates 9924)	FBI Digital Forensic Examiner Keanu L. Beltran			
111.	Defendant's texts (Bates 10134-10135)	FBI Digital Forensic Examiner Keanu L. Beltran			
112.	Defendant's texts (Bates 10282-10284)	FBI Digital Forensic Examiner Keanu L. Beltran			

Ex. #	Description	Witness Establishing Foundation	Objections and Reasons	Date Identified	Date Admitted
113.	Defendant's texts (Bates 10286-10287)	FBI Digital Forensic Examiner Keanu L. Beltran			
114.					
115.					
116.					
117.					
118.					
119.					
120.					
121.					
122.	Translation of dash camera video part 1	Stipulation			
123.	Translation of dash camera video part 2	Stipulation			
124.	Stipulation re Accuracy of Translations (Dkt. 89)	Stipulation			
125.					
126.					

Ex. #	Description	Witness Establishing Foundation	Objections and Reasons	Date Identified	Date Admitted
127.					
128.					
129.					
130.	Honda records	902(11)			
131.					
132.					
133.					
134.					
135.	Honda 902(11) declaration	902(11)			
136.	T-Mobile 902(11) declarations	902(11)			
137.	PayPal/Venmo 902(11) declaration	902(11)			
138.					
139.					
140.					
141.	Photos of defendant's tattoos	HSI SA Karen Gaspar	FRE 402, 403		
142.					
143.					

Ex. #	Description	Witness Establishing Foundation	Objections and Reasons	Date Identified	Date Admitted
144.					
145.					
146.					
147.					
148.					
149.					
150.					
151.					
152.					